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9 KD Creatives, Inc.

10 **UNITED STATES DISTRICT COURT**
11 **EASTERN DISTRICT OF CALIFORNIA**

12 JENNIFER CARRUTH,

13 Plaintiff

14 vs.

15 KD CREATIVES, INC.,

16 Defendant.
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Case No.: 2:24-CV-02484-DAD-SCR

**STIPULATION TO EXTEND TIME TO
RESPOND TO INITIAL COMPLAINT**

Complaint served: September 13, 2024
Current response date: November 15, 2024
New response date: December 6, 2024

1 Plaintiff JENNIFER CARRUTH (“Plaintiff”) and Defendant KD CREATIVES,
2 INC. (“Defendant”), by and through their undersigned attorneys, stipulate and agree as
3 follows:

4 WHEREAS, Plaintiff served Defendant on September 13, 2024, with the
5 Complaint (“Complaint”) in the above-referenced action;

6 WHEREAS, Defendant’s original deadline to respond to this initial service was
7 October 4, 2024;

8 WHEREAS, pursuant to Local Rule 144, the parties stipulated to a twenty-eight
9 (28) day extension of time in order to investigate and discuss a potential settlement of the
10 dispute, making Defendant’s response due on November 1, 2021;

11 WHEREAS, the parties stipulated to an additional fourteen (14) day extension of
12 time in order to investigate and discuss a potential settlement of the dispute, making
13 Defendant’s response due on November 15, 2021;

14 WHEREAS, the parties continue to actively investigate the allegations in the
15 Complaint for purposes of settlement discussions;

16 WHEREAS, accordingly, respective counsel for the parties have agreed to extend
17 Defendant’s time to respond to the Complaint for 21 days, up to and including December
18 6, 2024, in order to continue with investigation and settlement discussions, with the goal
19 of reaching a resolution without incurring potentially unnecessary litigation expense, nor
20 wasting judicial resources;

21 Accordingly, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

22 Without prejudice to any of the parties’ rights or defenses, Defendant’s time to
23 respond to the Complaint in this action shall be extended for 21 days, until December 6,
24 2024.

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1 SO STIPULATED.

2 Dated: November 13, 2024

NOLAN HEIMANN, LLP

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4 By: /s/ Jordan Susman

Jordan Susman

5 Attorneys for Defendant

6 KD Creatives, Inc.

7 Dated: November 13, 2024

HEDIN, LLP

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9 By: /s/ Frank S. Hedin (as authorized on November 13, 2024)

10 Frank S. Hedin

11 Attorneys for Plaintiff

12 Jennifer Carruth